October 23, 1990

Mr. William K. Reilly Administrator Environmental Protection Agency

Dear Mr. Lailly:

lan writing to urge you to deny approval of Ethyl Corporation's application to include Hitec 3000, a manganese-based additive, in gasoline.

At high doors, manganese is a demonstrated human neurotoxin, eausing irreversible patthological effects on brain structure. Here is evidence that manganese can brake INA chains, which may indicate concer-causing potential as well. The cumulative effects of gadual manganese contamination of the environment are unknown, but may be assumed to be harmful.

Based on the lessons learned over more than fifty years of tetraethyl lead exposure and poisoning, there simply is no justification. For allowing another toxic heavy metal to be added to gasoline. Please fulfill the mandate of your agency by protecting the environment from the harmful effects of the 3000.

He favoi of a reply is requested.

yours truly,

Deborah Lussell

1350 La Blaya Santancisco, Ct 94122

900CT 26 PZ: 13

Richard E. Vincek 59 Tuxedo Avenue Hawthorne, NJ 07506

October 23, 1990

Mr. William K. Reilly, Administrator United States Environmental Defense Agency Washington, DC 20460

Dear Administrator Reilly:

I believe that the Ethyl Corporation's "Hi-Tec 3000" manganese-based gasoline additive will be a major detriment to our environment and urge you to deny their application for its use.

Please help us protect our environment and well being from such obvious abuses.

Sincerely

Richard E. Vincek

REV/bt

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CORR. CONTROL

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900CT 26 F2: 19

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Mr. William K. Reilly Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. William K. Reilly:

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000", a toxic manganese-based gasoline additive.

To disregard lessons from a similar experience of 50 years ago by approving the widespread and inevitable dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetion. We are urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

Sincerely,

Mary Lee 1075 Wood Ct.

Hollister, CA 95023

900CT26 P2: 119

4

AND THE RESERVE OF THE STATE OF

and the second second

13 Dana Lane Colts Neck, N.J. 07722 Oct. 23, 1990

Mr. William K. Reilly, Administrator Environmental Protection Agency A-100, 401 M Street SW Washington, DC 20460

Dear Mr. Reilly:

I understand that the Ethyl Corporation has applied for approval of a manganese-containing gasoline additive, MMT. In light of our nation's experience with leaded gasoline, I am appalled at the prospect of another toxic substance being used in the same highly dispersed fashion. Given what we now know about cumulative buildup of toxics in air, soil, and dust, It is inconceivable to me that EPA could even consider granting such a request. As a pediatrician and public health physician, I am painfully aware of the seriousness and prevalence of lead poisoning in children. We must not allow this error to be repeated. Please deny Ethyl Corporation's application and prohibit all use of manganese as a gasoline additive. Thank you.

Sincerely yours,

Cegniti Gen

Elizabeth Feuer, M.D.

RECEIVED

EPA

CORR. CONTROL

37892

900C126 P2.26

Maryjane Allen 4301 Raleigh Court, #1805 Midland, Texas 79707 (915) 699-4019

October 23, 1990

Administrator William K. Reilly Environmental Protection Agency 401 M Street, SW Washington, D.C. 20460

Dear Administrator Reilly,

Your position as caretaker for the uninformed or unsuspecting public is a responsibility I know you don't take lightly. Pressure to rationalize or minimalize consequences must be tremendous from companies hell-bent on profitmaking schemes. There can be no compromise when blatant disregard for human health and welfare exist solely for a profit motive. I urge you to continue your strong leadership and deny Ethyl Corporation's application for "HiTec 3000", a toxic manganese-based gasoline additive. Our environment and our bodies are so fragile We don't need to reverse or compromise an EPA policy that is our only protection from invisible and random poisoning.

Sincerely,

Maryjane Allen

P.10

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CORR. CONTROL

37899

900CT 26 P2. 7



REAL ESTATE FINANCING

10/23/90

William K Reilly 401 M. Street SW. Washington D.C. 20460

Dear administration Reilly,

Is a Concerned Citizen and an environmentalist of am asking you to please deny Ethyl Corporation's application for HiTec 3000, a toxic manganese-leased gosoline addition.

Noon dettrong it completely

Sinculy Dono Borlesso

P.12

RECEIVED

EPA

CORR. CONTROL

900CT 26 P2. 13

315 Inst. Hill Zexington, Va. 2 4450 Detiber 21, 1550

Dear Mr. Rully -

Plene tally this letter against allowing the Ethys Corporation EPAIs approal of their new goodine additive Hi Tex 3000.

They should have to supply the text date to man and prove that it is not harmful to man and his environment. Only your against should cheek it coupled! Having finish, sollen lead out of goodine, we do not need to replace it inthe mangarere!

We do not need to replace it inthe mangarere!

Sincerity, James & Sames, M

P.14

RECEIVED CORR. CONTROL

900CT 26 PZ. 14

Dear Mr. Reelly,

For the sake of public health, please do not approve the Ethyl Corporation additive, Hi TECBOOD, Containing Manganese. This additive is potentially dangerous and has not been proven safe. For once, let our health needs supercede Ethyl Corporation's self-serving profet motive. Please deny the HiTec 3000 application.

Thank you.

Charlet Steffanni 5820 California Long Beach CA 90805

900CT 26 PZ: 15

R.M. Sloan

13900 Marquesas Way, Apt. A20 Marina Del Rey, California 90292

ADMINISTRATOR, EPA QUET. 19,1990 WM. K. REILLY SUBJECT: "H; TEC 3000" DEAR MIR. REILLY,

"HITEC 3000"/

THE HAZARDOUS POTENTIAL

(S SIMPLY TOO BREAT TO PERMIT

THIS PRODUCT TO GO ON THE

MARKET AT THE PRESENT TIME.

TEARNERTY PRAY THAT YOU WILL NOT LET THIS HAPPEN.
LORD ILNOWS WEVE GOT
ENOUGH PROBLEMIS ALREADY!

S PAICHERELY, Rudhun

900CT 26 P 2: 5

900CT 26 F 2. H9

J. Hedrich 409 S. Gladstone Aurora, 12 60506 October 24, 1990

Dear Mr. Ruilly,

I am writing to urge you to deny Ethyl Corporations request to produce and market HiTec 3000. This product will generate large and dangerous amounts of manganese and introduce them into the air. Please, the EPA must be our environmental matchdog and stop companies like Ethyl Corp. from pulling the wool over our eyes. Thank you

Sincerely of

CORP. CONTROL

SOCT 26 F2: U3

AMY STONE

240 West 15th Street, New York, NY 10011 • 212/255-9206

10/23/90

Dear Administrator Reilly -

d unge ym to deny Ethyl Congration's Application for "Hi Tea 3000" trice manganese-based Jasaline additive.

both the enumers and people.

Sineuly, Any Stone

900CT 26 P 2 : 35

PROFESSIONAL ASSOCIATION

25 Independence Boulevard

PHONE 908 • 647 • 1022

ATTORNEYS AT LAW

Warren, New Jersey 07059-6747

Fax 908 • 647 • 7721

October 24, 1990

Mr. William K. Reilly Environmental Protection Agency 401 M Street, S.W. Washington, D.C. 20460

HiTec 3000

Dear Administrator Reilly:

I am writing to urge you to reject the Ethyl Corporation's proposal to launch a new experiment on the American public with their gasoline additive HiTec 3000. I find it almost inconceivable, given our constantly growing awareness of the need to be gentler with our biosphere and ourselves, and the untold damage suffered and to be suffered from the lead additives of the past 60 years, that a company with Ethyl's record has the chutzpah to suggest that we give another additive a try, without any hard evidence of its long-term safety.

Please keep this country moving in the right direction, both for our own sake and in order to provide the right kind of example for the rest of the world's countries as they wrestle with the balance between near-term economics and long-term stewardship.

And thanks for hanging in there with what must be a pretty thankless job.

Sincerely

William ∏. Knox IV

900CT 26 P 2: 84

2045 15 ave, S.W. Vero Beach, Il. 32962 October 23, 1990

Administrator William K. Heilly Environmental Protection Egenly 401 "M" Street A. W. Washington, D. C. 20460

Dear administrator Reilly:

les an environmentalist and an active member of several environmental organizations including Environmental Defence Agency, Natural Resources Defence Council, Whe hotus Conservancy, and Friengeace, of ann writing to strongly urge you to deny to the Ethyl Corporation their application for a new product, "Hi see 3000". This manganese - based josoline addition its tokic and Aft to rulnown stothis going to allow its widespread seage. of few the nation would experience another terribed health groblem in years to come if not immediately, just at the additions of lead to gosoline beginning in 1925 caused a large amount of lead presoning throughout the world, and evertually leading to its removal from gosoline.

yours truly, Trang Je Strefel

P.28

RECEIMED

EPA

CORR. CONTROL

300CT 26 FZ: 84

6 Pine Street Scotia, N. Y. 12302-2810 October 24, 1990

William K. Reilly, Administrator Environmental Protection Agency 401 M Street, SW Washington, D.C. 20460

Dear Mr. Reilly:

The Ethyl Corporation, as you know, is presently asking the EPA to approve a new gasoling additive which it calls "HiTec 3000", and has launched a full blown ad campaign which represents this additive as both safe and - can you believe it - even environmentally beneficial. In reality, "MiTec 3000" contains manganese, a toxic metal known to produce Parkinson's disease at high doses. The technical name for the additive is methycyclopentadienyl manganese tricarbonyl.

This is the same Ethyl Corporation which closed its eyes, and subsequently the world's eyes, to the lead poisoning of 40 workers in its tetraethyl lead laboratories and the deaths of five of them, in 1925. For the sake of company profits Ethyl now wants to open our environment to what would be close to a repeat of the world-wide catastrophe of lead poisoning, not only perpercons ingesting the new additive from the air, but also from its dust everywhere that engines using the compound have passed by. Children would thus be particularly at risk. I realize that currently OSHA rates the toxicity of manganese one one-hundredth as high as that of lead, but even if their evaluation is correct, athat is still a substantial and totally unnecessary risk.

Thus it would, a sad and terrible mistake if an agency or our federal government allowed even a diminished repeat of the lead disaster to be foisted on the country and the world.

Please don't give the approval that would let this happen.

Sincerely,

William M. S. Richards

900CT26 P2:33

October 23, 1990

Environmental Protection Agency Administrator Reilly 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly:

The EPA must NOT allow the Ethyl Corporation to use the gasoline additive called "HighTec 3000".

The Ethyl Corporation has misrepresented this new additive as both safe and environmentally beneficial.

Please, DON'T allow manganese to be added to the lead poisoning, disaster, of the world.

Sincerely,

M. & Mrs. E. Skee Kan

Mr. & Mrs. E. Sheehan

12 Beverly Road

Wantagh, New York 11793

900CT 26 P2: 117

1 ,

FROM: HABIB RATHLE, ND 2350 SOWH AVE B, APT 203 YUMA, AZ 85364

22 oct 90

TO:

WILLIAM K. REILLY

EPA

RE: "HITEC 3000" GASOLINE ADDITIVE.

Dear Mr Reilly,

I just learned that the Ethyl Corporation, imfamons for its leaded gas is asking for approval by the EPA of a new additive, "HITEC 3000", I containing Hangamese.

I hope the EPA will diny approval of Jet another chemical, which do years from now, will probably prove to be as dangerous as lead.

I also use you to promote more fuel-efficiency, and solar power.

Sincerely.

Pediatriciam.

P.34

RECEIVED

CORR. CONTROL

37648

900CT 25 P2. 111

67 Sperry Drive Henrietta, NY 14467 October 20, 1290

Dear Mr. Reilly:

Ethyl Corporation has requested EPA permission to use "Hitec 3000" as a gasoline additive. I understand that there are no validated, impartial, petr-reviewed, long-term health studies and no similar environment studies to demonstrate the safety of this additive for both people and the environment.

I urge you to reject Ethyl Corporation's application to use "Hite 3000" has a gasoline additive.

Sincerely C. Michael Reimringer

\$000725 FZ. 110

William K. Reilly Administrata Environmental Protection Agency tol M Street, SW Washington, DC 20460

October 22, 1990

Dear Mr Reilly

I have recently learned of the Ethyl Corporations neglect to approve a grasoline additive called HiTec 3000 to use in the products, I undestat this product contains Manganese, a heavy metal which may write Serious prublem it allowed to be released int oth environment. I oppose the un of this product & repet that you as the blader of the organization designed to protect us of our envisonment from harmall products Da that approval for it's use is fully denied by the EPA At a tim who we one facing so many conviounabel Crisis I think we should Stop the high powered efforts of such hig money grants as the Ethyl Corporation from pushing thru approval of enrife products. Thoulyon for assuring HiTec 3000 's rejection of for protecting us from protectial harm Sinandy Jame # Shurp

JAMES H SHROPSHIRE

ST Paul, MN 55/03

900CT 25 P2. 110

Airline Film & TV Promotions, Inc. - Valley Studio

13246 WEIDNER STREET . PACOIMA, CALIF. 91331 . (818) 899-1151

Oct 22,1990

Administrator William K. Reilly Environmental Protection Agency 401 M Street S.W. Washington, DC 20460

Dear Mr. Reilly,

The wireservices carried an alarming story recently that the Environmental Protection Agency was considering the Ethyl Corporations proposal to introduce HiTec 3000 into our gasoline.

It took this country (USA) sixty years to remove leaded fuel supplied by the Ethyl Corp. from our gasoline after we all learned it was poisoning our population.

It is inhumane to think that the EPA would even consider allowing any company to add toxic heavy metal to gasoline that could further pollute our already foul air. You should know better than I that these additives will do great harm to our already endangered environment.

I can assure you, if the Ethyl Corp. is given the go ahead on this proposal, you will hear the loudest outcry ever from the voters who will certainly let Mr. Bush and the Congress know who is to blame and their future elections will be in very serious trouble.

Yours truly,

Byron W. Schmidt

900CT 25 P 2: 00



36th IPA CONGRESS, ROMA 1989

2000 Linwood Avenue, 18P Fort Lee, New Jersey 07024 23 October 1990

Administrator William K. Reilly Environmental Protection Agency 401 M Street SW Washington, D. C. 20460

Dear Mr Reilly!

I am endrency concerned about the Ethyl Corp's wish to use HiTec 3000, containing the toxic heavy metal manganese. We know now the until damage due to chronic leed poisoning from gas additives.

We have an apportunity to prevent this new scourge from happenery. Let us all prevent our children from inheriting a polluted earth.

Thank you for your time and attention.

Best. Werdand

900CT 25 P1:58

DIANNE KADAH

Presentation Graphics Consultant

235 Adams Street Suite 3F Brooklyn Heights, N.Y. 11201 (718) 802-9855

OCTOBER 20, 1990

MR. WILLIAM K. REILLY EPA ADMINISTRATOR WASHINGTON, D.C. 20460

DEAR MR. RETUY,

AS A CONCERNED CITIZEN OF THIS COUNTRY,

I FEEL THAT IS IS IMPERATIVE THAT THE E.P.A.

DENY ETHYL CORPORATIONS APPLICATION FOR

"HITEC 3000" TO BE USED AS A GASOLINE

"HITEC 3000" TO BE USED AS A GASOLINE

ADDITIVE; CONTAINING TOXIC MANGANESE.

IT IS THE THAT THE U.S. STOP ALLOWING CORPORATIONS TO ACT IN UNETHICAL AND IRRES-PANSIBLE MANNER TOWARDS OUR ENVIRONMENT PANSIBLE MANNER TOWARDS OUR ENVIRONMENT AND CONSEQUENTLY THE PEOPLE OF THE PLANET.

THIS IS YOUR OPPORTUNITY TO DIP FUTURE DISASTER IN THE BUD; BEFORE UNTOLD DAMAGE AND COST BEFAUL US.

Sincerely. Dianne Kadal

900CT25 P1:54



Gregory J. Erickson Attorney-at-Law 509½ Second Street Hudson, Wisconsin 54016 (715) 386-9315 (612) 436-8824

October 22, 1990

William K. Reilly Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Administrator:

I have learned that an American company, Ethyl Corporation, is applying through your agency for permission to introduce a new gasoline additive known as HiTech 3000. I believe this additive will be harmful to the environment and I urge you to deny permission for its introduction.

The product is unnecessary. The high Manganese content of Hitech 3000 poses a potentially grave environmental threat as well. Finally, Ethyl Corporation has acted irresponsibly in the past. As the principal supplier of lead gasoline additives they have played a significant part in the lead poisoning problems we are facing.

Mr. Administrator, we should not allow another toxic heavy metal to be introduced into our environment. I strongly urge you to deny Ethyl Corporation permission to introduce this product. I would be interested in hearing your views on this matter. Kindly respond to my attention at the letterhead address.

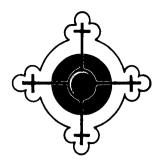
Thank you for your consideration.

Sincerely,

∕Gregory J. Erickson Attorney at Law

GJE/krs

9000125 P1:53



JOHN F. COGSWELL, Ph.D.
Psychological and Consulting Services

Colminatestor William K. Reilly Environmental Protection Squary 401 M Street, Sw Washington, D. C 26460

Dear Mr. Reilly.

For the sake of our environment and our people, I strongly use you to deny Ethyl Corporation's application for 'H; Tec 3000,' a toxia manganese - board gasoline additive.

Somety, John F. Cojswell

900CT25 P1:52

10/19/90

Administrator William K. Reilly Environmental Protection Agency 401 M. Street, 5W Washington DC 20460

Dear Mr. Keilly, Why do I have to ask you to make a decision that you were hired to make in

the first place?

Please not a decision to PROTECT THE ENVIRONMENT! Please dery the Ethyl Corporations application for "Hi TECH 3000."
We do not held any more toxic substances in the environment.

Society will feel outwardly betrayed if this application greather.

Greenly,

Thani Spuldig-Sebastian

organizations to noble you nake pure you as the hight thing.

900CT25 P1:50

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Oct. 20, 1990

Dear Administrator Reilly,

We learned recently about Ethyl Corporation's application for "HiVec" 3000, a toxic manganese based gas additive.

We sat in horror thinking that you, the EPA might seriously consider such an asanine and dangerous move, just so a money hungry "Big Business" can make a few extro- bucks at our biosphere's expanse again!

As concerned citizens, we strongly urge you to deny Ethyl Corporation's application.

Sincerely,
Renée Olmo
Dana M'Call
Box 112A

Davenport, NY 13750

KECEIVED

CORR. CONTROL

900CT 25 P1:47

The EPA:

Dear Mr Reilly,

I am shocked to think that the Ethyl Corporation would have the audacity to petition for the approval of the "HiTed 3000" gasoline additive which contains the toxic heavy metal manganese.

How many more decades will it take for us to understand that corporate profit motives parading as consumer benefits are poisoning our environment and destroying our health. If people were informed, if politicians addressed issues of substance, if offices like yours stood up more stringently to corporate strongarming, then I would not be writing to you today.

Do we want a repeat of the lead poisoning epedemic? How many will suffer the effects of toxic manganese exposure if "HiTec 3000" is approved? It is high time to send a message to the corporate sector: "We will not have the lifte of the

environment compromised for a fist full of money."

Trank you Light

900CT25 F1:47

William Henry Apartments Ivy 115 Malvern, PA 19355 October 22, 1990

Mr. William K. Reilly, Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly,

I am deeply disturbed about the potential use of HiTec 3000 as a gasoline additive. I understand that the additive contains manganese, which at high doses is a human neurotoxin. I also understand that the long-term effects of chronic, low-dose exposure to manganese are largely unknown. Given these facts and Ethyl's actions vis-a-vis leaded gasoline, to approve the use of HiTec 3000 is to sanction environmentally irresponsible behavior. As an environmentalist and a taxpayer, I urge you to live up to the responsibilities of your office by denying Ethyl Corporation's application for HiTec 3000.

Sincerely

Daryl L. Hall

900CT 25 PI: 44

October 23, 1990

2 Waterview Road, D-10 West Chester, PA 19380

William K. Reilly Administrator Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly,

I strongly urge you to deny Ethyl Corporation's application for HiTec 3000. The gasoline additive contains manganese, a toxic heavy metal that in high doses is a demonstrated human neurotoxin. There's no reason to open our environment to a new health hazard, and we can't tolerate future unknown clean-up costs when this problem is totally preventable today. As an environmentalist and a taxpayer, I urge you to rise to the responsibilities of your position and prohibit the introduction of HiTec 3000.

Sincerely,

Anne Swigart
Anne H. Swigart

900CT25 P1:44

2310 Hay. 1063 Independence, La. 70443 10/20/90

Dear Mr. Reilly,
We need cleaner forels and safe energy alternatives,
not toxic zoroline additioner. I strongly urge you to
reject Ethyl Corporation's application to manufacture and
market "Hi Tec 3000."

Sivcerely, Faank J. Chalma J.

900CT 25 P1:43

09 55,80

Greetings Mr. Railly.

This letter regards the issue of "HiTar. 3000' additive to gasoline being proposed by the Ethyl (orporation. Since their, are serious grestions about the use of manganese additives, I unge you to take the time to fully study his issue.

Being aware of your trachground and concern for our planet, I know you want to do what's right. Since I'm also aware of the politics of insported influence, I recognize that you need the support of a concerned population to affect the changes you know are necessary in protecting the on Contin.

This concern of mine has motivated me to poin the organimations which I perceive can berefit our world. Please use your influence to help these organizations of concerned individuals to preserve and enhance Earlis life and resources.

Please do not approve "HiTee 3000"
until all consequences can be analyzed.
I hims you agree we need to put human
ond environmental health above the
greet for profits (shoot-term profits and
long-term ignorance = future problems.)
Sincerely, Cintis A. Phillewells

900CT 25 P 1:42

1001 N. PROVIDENCE RD. MEDIA, PA. 19063 OCTOBUR 20, 1990

ENVIRONMENTAL PROTECTION AGENCY 401 M STREET SN WASHINGTON, DC 20460

DEAR SIR!

AS AN ENVIRONMENTAUST AND WORLD CITIZEN CONCERNED ABOUT THE GUYLING OF THE AIR WE ALL BREATHE, I STRONGLY DRISE YOU TO DENY ETHYL CORPORATION'S APPLICATION FOR HITEC 3000, A TOXIC MANSANTSE-BADED GREDLINE ADDITIVE.

IF WE PREVENT THIS STUATION NOW, WE WON'T THIS SPEND THE MONEY TO CORE WON'T THE IS WE DID WITH THE VERY IT LATTE AS WE DID WITH THE VERY SAME COMPANY'S TETRA ETHYL LEAD ADDITIVE.

YDORS TRULY,

Carol J. Conlow
CAROL J. CONLOW

900CT 25 P1: 40

Dear Mr. Reilly.

I am writing to you today in hopes of preventing another Ethyl Corporation disaster. The unknown hazardous potential of "HiTec 3000" is reason enough NOT TO APPROVE it as the gasoline additive of the '90's:

Our environment and public health cannot be exposed to further, probable irreversible, damage. Both are struggling for survival as it is!

Now is the time to take advantage of a rare opportunity indeed. This is one environmental disaster that can be prevented; one chronic exposure experiment that the U.S. population need not be subjected to.

I strongly urge you, as Administrator of the EPA, to seriously consider Ethyl Corporation's past history of "safe and environmentally beneficial" gasoline additives, as well as the possible future consequences to the environment and human health; then convince yourself and your colleagues to BAN "HiTec 3000" ... BEFORE IT'S TOO LATE!

Sincerely,

C.L. Moraczewski

C.d. Morac Tewski

900CT 25 P L: 39

36 Porter Street Somerville, MA 02143 26 Oct 90

William K. Reilly EPA Administrator 401 M Street, SW Washington, DC 20460

Dear Mr. Reilly:

Please deny the application of the Ethyl Corporation to add MMT to gasoline. We do not manganese spread throughout our country as leaf is. Emissions are better reduced by aiding Public Transportation and getting auto manufacturers to better engineer their cars. Not by releasing a dangerous toxic chemical everywhere we live, work, and play.

Has anyone studied the effects of MMT and manganese on catalytic converters? Will they foul the converters and ruin them?

I also ask that you do everything possible to prevent the Ethyl Corporation from exporting this dangerous technology.

Thank you.

Sincerely,

Leonard Tower Jr

900CT31 AIO: 09

P.69

Mr. William K. Reilly E.P.A. Administrator Washington, D.C. 20460

Dear Mr. Reilly:

It is my understanding that the Ethyl Corporation has introduced a new gasoline additive, methycyclopentadienyl manganese tricarbonyl (M M T) and has asked EPA to approve it as an octane-enhancing gasoline additive.

Let us not repeat the mistake which was made in 1925 when the Ethyl Corporation introduced the additive tetraethyl lead to the gasoline used in our cars. We learned too late of the deadly effect this additive has had on the lives and health of our citizens. We cannot afford another such mistake.

I wish to register my opposition to any approval of (M.M.T) by EPA for use as an additive to the gasoline used in our motor vehicles.

Please give this matter the attention which it deserves and let me know where you stand on the question.

Respectfully,

Lawrence C. Lemmon 2524-A S. Arlington Mill Drive Arlington, Virginia 22206

P.70

RECEIVED

EPA

CORR. CONTROL

38583

900CT 31 AIO: 07

Dear William K. Rilley
Environmental Protection Agency
401 M. St. SW
Wash D.C. 20460

Please do not allow Ethel Corp to sell a new gas called Hi Tec 3000. This contains manganese a toxic heavy metal known to produce symptoms of Parkinson's disease. The long term effects are unknown and could be dangerous. This same company has championed the use of leaded gas since 1925 which we now know to be quite a health hazard.

ARTHUR FREYER
2409 Mc Kinley
Berkeley CA 94703

P.72

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EPA

CORR. CONTROL

38584

900CT 31 AIO: 03

Irene Dobry Glass 7957 Ashford Boulevard Laurel, MD 20707

October 29, 1990

Mr. William K. Reilly Administrator EPA Washington, DC 20460

Dear Mr. Reilly:

Please reject Ethyl's application to use NMT as a gasoline additive. As you know, MMT is a manganesed-based compound, and manganese is known to be a human neurotoxin. We have already done enough damage with lead—let's not risk doing the same with manganese! Furthermore, Americans have been doing just fine with the gasoline that is available for sale now—without MMT! Please heed the request of the American people you watch over, and keep our environment as safe as possible in this highly toxic age! We're counting on you!

Thank you.

Sincerely,

Irene Glass

Sene Plass

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CORR. CONTROL

38587

900CT 31 A 9: 59

P.75

Levre Sher 49 Robinson Parhway Burlangton, V+ 0540/ 10/27/90

William K. Reilly, Head Environmental Protection Agency Washington, DC 20460

Dear Mr. Reilly:
This note is to unce you to reject the pending proposal to allow allow manganese as a gosoline additive in the U.S. I'm not a scientist, but I've read the report on the proposal in the Environmental Defense Fund Newsletter, & and I'm convinced by what it see there. Best to en an he side of caution — we can't need a repetition of the lead disaster.

Sincerely, George Flen

RECEIVED

EPA

CORR. CONTROL

3869

900CT 31 P3: 22

Karen L. Aldridge 6505 Paula Court North Richland Hills, Tx 76180

William K. Reilly Environmental Protection Agency Washington, D.C. 20460

October 24, 1990

Dear Mr. Reilly,

I am concerned about the application of The Ethyl Corporation of America to the Environmental Protection Agency for approval of a manganese-based gasoline additive called HiTec 3000.

Manganese is a toxic heavy metal. Long-term effects on humans breathing this metal are unknown. I personally don't want to be the human test subject for breathing this toxic metal.

Please read about manganese. Have research done. Learn what scientists do know about the effects of this on living beings.

And when you're done, DENY Ethyl Corporation's application, for us, for the children, for the good of all air breathing creatures.

Thank you for your help.

Kann aldudge

Sincerely,

Karen Aldridge

CC

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EPA

CORR. CONTROL

900CT 30 All: 25

BALIS & STONE



General Agency Berkshire Life Insurance Company 151 Merrimac Street, Suite 300 Boston, Massachusetts 02114 (617) 722-0300 (617) 722-0301—FAX

John Balis, CLU, ChFC Richard P. Burton, CLU, ChFC Barry F. Cohen Sherman Cohen Kenneth P. Kates, CLU, ChFC Mitchell Marcus, CLU Joseph Stone, CLU, ChFC

October 25, 1990

William K. Reilly, Administrator Environment Protection Agency 401 M.ST. SW Washington, DC 20460

Dear Administrator Reilly:

Please deny Ethyl Corporation's application for Hi Tec 3000 which is a toxic manganese - based gasoline additive.

The EPA should be doing everything possible to clean up the air pollution in this country. By denying Ethyl Corporation's application for Hi Tec 3000, you would be doing something positive toward lowering air pollution.

Sincerely yours,

Kenneth P. Kates, CLU

KPK:kad

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900CT 30 All: 23

37 Hill Street Williams Bay, WI 53191 October 26, 1990

Administrator William K. Reilly Environmental Protection Agency 401 M Street, SW Washington, DC 20460

Dear Sir,

I am writing to ask you to deny Ethyl Corporation approval to use "HI Tec 3000" as a gasoline additive.

"Hi Tec 3000" contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. No one knows what health problems will be created from chronic exposure to manganese or how much money will be required to clean up manganese contamination.

Ethyl Corporation is the company that championed the use of leaded gasoline, which has contributed to lead poisoning for millions of children around the world. Children ingest the lead from yards and playgrounds contaminated by lead from automobile exhaust. New research indicates that lead poisoning is a virtual epidemic among our nation's children, both rich and poor as well as urban and rural children. Cleanup of contaminated soil will be both slow and extremely expensive.

The EPA has the power to prevent another environmental and public health disaster by denying Ethyl Corporation to market "Hi Tec 3000". Please prevent Ethyl Corporation from exposing the public to yet another toxic heavy metal with unknown health effects and cleanup costs.

Sincerely,

Maresa Foley
Theresa Foley

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HEALTH DYNAMICS CHIROPRACTIC

Dr. Robert K. Zigler Dr. Katherine N. Zigler

1819 W. State Street Boise, Idaho 83702 (208) 345-0969

10-25-90

William K. Reilly
Administrator
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Mr. Reilly,

As a physician, environmentalist, and concerned citizen, I must strongly urge you to deny the request by the Ethyl Corporation for permission to add "HiTec 3000" to gasoline. "HiTec 3000" is based on manganese, which is a proven nucrotoxin in high levels. What is unproven, though, is what the long term effects of manganese would be if accumulated in the tissues over a period of time. This is reminiscent of the health disaster that has resulted from the use of lead in gasoline (another "gift" from the Ethyl Corporation) over a period of several years. Please help us to protect our children:

Sincerely,

Robert K. Zigler, D.C.

Roberta Zigle DC

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To E	EDF Member:	Mr. Steve Nash 206 Stasia Ct NOVATO CA 94947-1918	Membership No:	04690681 ABCW6B
sign	our "Open Let	g you as one of a select gro ter to the EPA" urging the Tec 3000," a toxic manganese	oup of EDF's most active mer nat EPA deny the Ethyl Corpor- e-based gasoline additive.	nbers to oration's
rosn	I need to <u>re</u> ond immediatel		29 to meet the advertising de	eadline. Please
respo	ond minediates	•	Fred Bryso	
	YES, Fred, I accept your invitation to sign on to EDF's Open Letter advertisement protesting Ethyl Corporation's "HiTec 3000" proposal, which would release large quantities of manganese into the environment.			
	I am enclosing the following tax-deductible gift to support the cost of the ad as well as EDF's scientific work on this critical manganese campaign and other efforts to protect the environment:			
		□ \$100 □ \$50	*□\$35 □\$20	•
	*A gift at this level or higher will move your name to a more prominent position in the ad under the banner "Member Leadership Committee on Manganese."			
		will appear as follows: M ny corrections needed)	r. Steve Nash	
	added technica		ow), the names of all participa see the other side of this page proposal.	
		(This advertisement paid members of the Environi		
	ADMINISTRA'	OPEN LETTER TO WITTOR, UNITED STATES ENV	LLIAM K. REILLY IRONMENTAL PROTECTION	N AGENCY
	Dear Administrator Reilly,			
	As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a toxic manganese-based gasoline additive.			
		Since	erely,	
			Undersigned Members of the ronmental Defense Fund	
		fer not to sign on to this adver- t-deductible gift in support of	ertisement but I would like to EDF's efforts:	make the

A copy of the last financial report filed with the Department of State may be obtained by writing to: New York State Department of Charities Registration, Albany, NY 12231, or to EDF, 257 Park Avenue South, New York, NY 10010.

Steer

A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

n 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing

yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

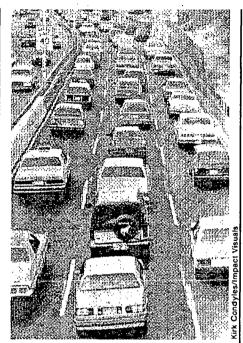
Lead poisoning is an epidemic in the U.S. Even after considerable reductions

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor-more important-any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But both what we know and what we do not know about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do not know what the long-term chronic, low-dose effects of human exposure to manganese are. We do not know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do not know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancercausing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT. 4860 Clayton Road, Apt. 38 Concord, CA 94521 October 24, 1990

William K. Reilly Administrator, Environmental Protection Agency 401 M Street, SW Washington DC 20460

Dear Mr. Reilly,

I recently received a letter from Fred Krupp of the Environmental Defense Fund, outlining a proposal by the Ethyl Corporation to win EPA approval of their "HiTec 3000" gasoline additive. "HiTec 3000" contains manganese, a toxic metal. As I understand the issue, about as much is known about long-term chronic manganese exposure today as was known about long-term chronic lead exposure in 1925, when leaded gasoline was introduced. Chronic long-term lead exposure turns out to have created, because of children's high sensitivity to lead, a nationwide epidemic of learning impairment. Let's not create another toxic sequel to leaded gasoline.

You and your agency have before you a rare, well-publicized, opportunity to be proactive, to BE your name. Please help protect the environment. Reject the Ethyl Corporation application for "HiTec 3000."

Sincerely,

Randall M. Clague

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900CT 30 A4: 27

October 16, 1990

Dear Friend:

I've had just about enough of the Ethyl Corporation. And once I tell you about the scheme that they're trying to put over on the U.S. population, I think you'll agree.

- The Ethyl Corporation of America is asking the EPA to approve a gasoline additive it calls "HiTec 3000."
- Ethyl Corp. has launched a full-blown ad campaign that misrepresents this new additive as both safe and environmentally beneficial.
- In reality, "HiTec 3000" contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses.
- Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In other words, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal.

And it won't be the first time!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a <u>major</u> contributing cause of chronic lead poisoning affecting <u>millions of children around the world</u>.

New research reveals a virtual lead poisoning epidemic among our nation's children, both urban and rural, rich and poor. Much of that lead -- ingested from dust and dirt in yards and playgrounds -- came out of the tailpipes of cars that burned leaded gas over the past 65 years. Cleaning up this contamination will be both slow and expensive.

Now, for the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

Luckily, you and I have until November 6th to stop them.

(over, please)

Ethyl has until November 6th to convince EPA to approve HiTec 3000. And it has been running full page ads in major newspapers in a shameless effort to lure the public and the Administration into believing that its new additive is safe.

This is one of those rare chances we have to nip an environmental disaster in the bud. Here are the 3 steps I ask you to take immediately:

- 1. Add <u>your</u> name to our "Open <u>Letter to the EPA" to appear</u> in a major newspaper adverting enclosed draft) to help us Corporation to newspaper readers.
- 2. <u>Double</u> the power of your protest by writing a short personal note to Administrator William K. Reilly, Environmental Protection Agency (401 M Street, SW, Washington, DC 20460).
- 3. Send your generous gift to support the newspaper ad and to help EDF continue this critical campaign.

You know that EDF can get results. Our persistent campaign against leaded gasoline helped win its large scale phasedown during the 1970's. But this was a battle we might never have had to fight, had Ethyl Corporation acted responsibly from the start.

You see, the hazardous potential of the original lead gasoline additive was never a secret to Ethyl. Back in 1925, 40 workers at Ethyl's first plant were stricken with lead poisoning and five of them died from it. But Ethyl Corp. ignored the obvious warning sign -- that these cases of acute poisoning foreshadowed a possibly tremendous chronic problem . . . once millions of tons of lead-laden car exhaust were pumped ino the environment.

We simply can't let Ethyl Corp. put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether preventable today. And with your help, and the 3-step plan I've sketched above, we won't have to!

Ethyl Corporation managed to fool the public once . . . and the resulting damage to the environment and public health, much of it irreparable, is done. All we can say now is "Shame on them."

But if we let them do it again, shame on us!

Yours truly,

Fred Krupp

Executive Director

P.S. Please sign and return <u>immediately</u> the Authorization to add your name to our Open Letter. I must receive it no later than October 29th to meet our newspaper deadline. And thanks in advance for your help!

M Rully - Plane use your good source in evaluating

Judith Niemeyer 12712 Ojai Rd. Santa Paula, CA 93060

William Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

, Judith Niemeyer

Judith Niemeyer

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. 10/29/90

Violet Oaklander 2929 Glen Albyn Dr. Santa Barbara, CA 93105

William Reilly, Administrator Environmental Protection Agency 401 M Street SW Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Most sincerely,

Violet Oaklander

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Administrator William K. Reilly Environmental Protection Agency to 1 M Street 5W Washington, D.C. 20460

Dear Mr. Reilly:

I am opposed to EPA's approval of the Ethyl Corporation's HiTec 3000 additive. It will be a serious mistake to allow another heavy metal to pollute our atmosphere through automobile advanst.

Sincerely,

Janie J. Frank

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CORR. CONTROL

900CT 25 P1: 34

843 Dorsey Drive Hudson, WI 54016 October 19, 1990

Administrator William K. Reilly EPA Washington DC 20460

Dear Administrator Reilly:

As a concerned member of this nation, I ask of you to reject Ethyl Corporation's application for "Hi Tec 3000." It has in it a toxic manganesse-based gasoline additive whose long term effects on human health are unknown.

Sincerely,

Mark R. Zenz

mour R. Zenz

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900CT 24 P3: 49

Mrs. Ronald Lewis Refsland Two Highland Circle Lewisburg, West Virginia 24901

Administrator William K. Reilly Environmental Protection Agency 401 m street, 5W washington, DC. 20460

Dear Mr Reilly,

I urge you to turn down Ethy/ Corporations request for a gasoline additive called Hi Tec 3000. A clear enveronment, is important for everyone's good health. say no to Ethyl Corporation.

Sincerely, Lucie Repland.

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